

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JULIE AVERBACH FOR THE ESTATE OF STEVEN :
AVERBACH, *et al.*, :

Plaintiffs, :

-against- :

CAIRO AMMAN BANK, :

Defendant. :
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No. 19-cv-00004-GHW-KHP

DECLARATION OF MICHAEL J. RADINE

I, Michael J. Radine, declare as follows:

1. I am a partner at the law firm of Osen LLC, which represents Plaintiffs in the above-captioned matter. I submit this declaration and the exhibits attached hereto in support of Plaintiffs' Opposition to CAB's Motion to Dismiss for Lack of Personal Jurisdiction Pursuant to Federal Rules of Civil Procedure 12(b)(2) Or, in the Alternative, Rule 56.

2. Attached hereto as **Exhibit A** is a true and correct copy of a letter dated July 29, 2022, from CAB's counsel to Plaintiffs' counsel.

3. Attached hereto as **Exhibit B** is a true and correct copy of a letter dated October 10, 2022, from CAB's counsel to Plaintiffs' counsel.

4. Attached hereto as **Exhibit C** is a true and correct copy of a letter dated October 18, 2022, from Plaintiffs' counsel to CAB's counsel.

5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the transcript of the Rule 30(b)(6) deposition of Khalid Mahmoud Al-Qassem, dated December 5, 2022.

6. Attached hereto as **Exhibit E** is a true and correct copy of Plaintiffs' Second Request for the Production of Documents by CAB, dated December 7, 2022.

7. [REDACTED]

[REDACTED]

8. Attached hereto as **Exhibit G** is a true and correct copy of records from the criminal trial of HLF that Plaintiffs produced to CAB, Bates stamped AV-PL013917-18, AV-PL013921-22, AV-PL013945-48, and AV-PL014011-14 (these records were published on the website of the U.S. District Court for the Northern District of Texas). These records show post-September 11, 2001, transfers from an account HLF held at CAB's Ramallah branch to an account it held at CAB's Gaza branch. Specifically:

- a. AV-PL013917-18: September 13, 2001, transfers totaling \$118,626 from HLF's account at CAB's Jerusalem Street branch in Ramallah to HLF's account at CAB's Gaza branch.

- b. AV-PL013921-22: September 16, 2001, transfer of \$90,000 from HLF's account at CAB's Jerusalem Street branch in Ramallah to HLF's account at CAB's Gaza branch.
- c. AV-PL013945-48: October 13, 2001, transfer of \$20,000 from HLF's account at CAB's Jerusalem Street branch in Ramallah to HLF's account at CAB's Gaza branch.
- d. AV-PL014011-14: November 17, 2001, transfer of \$10,000 from HLF's account at CAB's Jerusalem Street branch in Ramallah to HLF's account at CAB's Gaza branch.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Executed on March 10, 2023

/s/ Michael J. Radine